

EXHIBIT

B

HANLY & CONROY LLP
Paul J. Hanly, Jr. (PH-5486)
Jayne Conroy (JC 8611)
415 Madison Avenue
New York, NY 10017
(212) 401-7600

-and-

MOTLEY RICE LLC
Ronald L. Motley
28 Bridgeside Boulevard
Mount Pleasant, SC 29465
(843) 216-9147

Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

THOMAS E. BURNETT, SR., in his own right)
as the Father of THOMAS EDWARD)
BURNETT, JR., Deceased)

BEVERLY BURNETT, in her own right as the)
Mother of THOMAS EDWARD BURNETT,)
JR., Deceased)

DEENA BURNETT, in her own right and as the)
Representative of the ESTATE OF THOMAS)
EDWARD BURNETT, JR., Deceased)

MARY MARGARET JURGENS, in her own)
right as the Sister of THOMAS EDWARD)
BURNETT, JR., Deceased)

MARTHA BURNETT O'BRIEN, in her own)
right as the Sister of THOMAS EDWARD)
BURNETT, JR., Deceased)

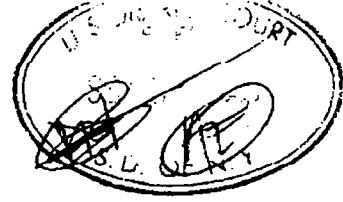
WILLIAM DOYLE, SR., in his own right and as)
the Representative of the ESTATE OF JOSEPH)
MICHAEL DOYLE, Deceased)

CAMILLE DOYLE, in her own right as the)
Mother of JOSEPH MICHAEL DOYLE,)
Deceased)

WILLIAM DOYLE, JR., in his own right as the)
Brother of JOSEPH MICHAEL DOYLE,)
Deceased)

DOREEN LUTTER, in her own right as the)
Sister of JOSEPH MICHAEL DOYLE,)
Deceased)

Doc # 3



03 CV 5738

AMENDED COMPLAINT

JURY TRIAL DEMANDED

328. Yassin Abdullah al-Kadi is a United States designated terrorist and Director of Global Diamond Resources, based in Nevada. Along with Yassin al-Kadi, serving on the board of directors are representatives of the bin Laden family who invested in Global Diamond Resources. Yassin al-Kadi was introduced to Global Diamond Resource's Chairman by an executive at the Saudi bin Laden Group. In regards to the company's decision to let al-Kadi join as an investor, the Chairman said, "I relied on the representations of the bin Laden family. They vouched for him."

329. Osama bin Laden's name is still listed in the Saudi BinLaden Group's corporate records.

Yassin Abdullah al-Kadi and Muwaffaq

330. One month after the September 11, 2001 attacks, on October 12, 2001, with Executive Order 13224, President George W. Bush designated Saudi businessman Yassin al-

Kadi as a terrorist entity and sponsor for financially supporting al Qaeda. As stated in a United States Department of Treasury Press Release on October 12, 2001:

Yassin al-Qadi (heads) the Saudi-based Muwafaq (or "Blessed Relief") Foundation, an al Qaeda front that transfers millions of dollars from wealthy Saudi businessmen to bin Laden.

331. Defendant Muwaffaq (or "Blessed Relief") was registered in the Channel Islands in 1992 but run from Jeddah, Saudi Arabia. The Blessed Relief charity had an international presence with offices in Europe, Ethiopia, Pakistan, Sudan, Somalia and a post office box in the United States. Blessed Relief purported to conduct traditional relief work such as the distribution of food, clothing and medical equipment to victims of war or famine. Blessed Relief was endowed by Defendant Khalid bin Mahfouz, the al Qaeda financier, and run by Yassin al-Kadi. Khalid bin Mahfouz's son, Abdulrahman bin Mahfouz, is also a director of the Blessed Relief charity.

332. Yassin al-Kadi ran Blessed Relief from 1992 until approximately 1997 with \$15 to \$20 million of his own money, along with contributions from other wealthy associates. Millions of dollars have been transferred to Osama bin Laden and al Qaeda through Blessed Relief. An audit of the Defendant National Commercial Bank of Saudi Arabia in the mid-1990s, which was then run by Khalid bin Salim bin Mahfouz, reveals the transfer of \$3 million for Osama bin Laden that was moved from the accounts of wealthy Saudi businessmen to Blessed Relief.

333. In a 1995 interview, Osama bin Laden identified Blessed Relief's place in his support network, "The bin-Laden Establishment's aid covers 13 countries . . . this aid comes in particular from the Human Concern International Society." Osama bin Laden went on to list a number of the Human Concern International's branches, including the Blessed Relief Society.

334. Yassin al-Kadi incorporated the United States branch of Blessed Relief in Delaware in 1992, along with Talal M. M. Badkook and Dr. Mohaman Ali Elgari. Blessed

Relief was an al Qaeda front used by wealthy Saudis and others to funnel money to Osama bin Laden's terrorist network.

335. Yassin al-Kadi is a Director of Global Diamond Resources, based in Nevada. He sits on the board as a representative of New Diamond Holdings, a firm that has a controlling interest in Global Diamond. Along with al-Kadi on the board of directors are representatives of the bin Laden family who invested in Global Diamond Resources a year before al-Kadi. Global Diamond Resources is a diamond company that manages three mines in South Africa. Although al-Kadi invested \$3 million into Global Diamond Resources through the company New Diamond Corp., his investment had diminished to about \$750,000 as of October, 2001.

336. Three of the al Qaeda members on the FBI's most wanted terrorist list have been discovered to have dealings in the diamond field. Following September 11, 2001, and the increased difficulty al Qaeda is facing moving its money through its traditional financial channels, al Qaeda has been converting more of its assets into diamonds. As one European investigator put it:

I now believe that to cut off al Qaeda funds and laundering activities you have to cut off the diamond pipeline. We are talking about millions and maybe tens of millions of dollars in profits and laundering.

337. Yassin Abdullah al-Kadi is the Vice President of the Saudi Arabian company M.M. Badkook Co. for Catering & Trading, owned by his partner in Blessed Relief, Talal Mohammed Badkook. Talal Badkook is also a member of the Al-Mustaqbal group along with Saleh Mohamed bin Laden, son of Mohammed bin Laden, and Abdullah Saleh Kamel, son of Saleh Kamel and the Chairman of the Dallah al-Baraka.

338. Yassin al-Kadi is the Chairman of the National Management Consultancy Center (or "NMCC") in Jeddah, Saudi Arabia. The NMCC lists an address in Jeddah, Saudi Arabia, which is the same address listed on Blessed Relief's Delaware corporate records.